

MorrisonCohen_{LLP}

Jason P. Gottlieb
Partner
(212) 735-8837
jgottlieb@morrisoncohen.com

October 6, 2020

VIA ECF

The Honorable Louis L. Stanton
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Ethereum Ventures, LLC v. Chet Mining, LLC, et ano.
Case No. 19-CV-07949-LLS

Dear Judge Stanton:

This firm has recently appeared on behalf of defendants in the above-referenced action. We write with permission of the plaintiff to request that the Court grant and endorse the parties' consensually agreed revised discovery schedule.

By way of background, as the Court may recall, this firm originally was in discussions to appear as counsel for defendants. However, we lost contact with Mr. Stojanovich and, in a letter dated April 24, 2020, we informed the Court that our firm would not appear in the action because we were unable to formalize the retention. Recently, Mr. Stojanovich contacted us and disclosed that we had not heard from him because he had been seriously ill, including battling a severe case of COVID-19 (complicated by other pre-existing conditions), and only has recently become well enough to continue litigating this matter. As a result, we now have filed our notice of appearance in the case.

We have discussed with plaintiff's counsel a reasonable extension of the discovery schedule. The parties have agreed to the following:

- Discovery requests/responses and document production by November 30, 2020
- Depositions and close of fact discovery by December 31, 2020
- Expert Discovery (if necessary) by January 31, 2021

Finally, given the agreed-upon revised discovery schedule, we also hereby respectfully request that the Court adjourn the submission of a pre-trial order (currently scheduled to be submitted this Friday, October 9, 2020), as well as the pre-trial conference currently scheduled for October 16, 2020 at 3:30 pm, in order to conserve judicial and party resources. The parties will make themselves available for a pre-trial conference after the close of discovery at the Court's convenience.

The Honorable Louis L. Stanton, page 2

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jason P. Gottlieb

Jason P. Gottlieb

cc: John F. Harwick, E. Stewart Jones Hacker Murphy LLP (via ECF)